

STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

ILLINOIS POWER COMPANY	:	
	:	
Petition for Alternative Approval of Implementation	:	No. 00-0461
of a Market-Based Tariff to Become Effective on or	:	
before January 1, 2001, pursuant to Article IX and	:	
Section 16-112 of the Public Utilities Act.	:	

PETITION FOR LEAVE TO INTERVENE

COMES NOW Olin Corporation, U.S. Silica Company, Spectrulite Consortium, Inc., Bunge Corporation, Marathon Ashland Oil Company, Air Products & Chemicals Company, Granite City Steel Division of National Steel Corporation, LTV Steel Company, Cargill, Inc., Caterpillar Inc., PPG Industries, Inc., and Illinois Cement Company, as the Illinois Industrial Energy Consumers, and for their Petition for Leave to Intervene in the above entitled matter, state as follows:

1. The Petitioners are authorized to do business in the State of Illinois and operate manufacturing and industrial plants in the State of Illinois.
2. The Petitioners are substantial users of energy within the Illinois Power Company (IP) service territory.
3. The Petitioners will be substantially affected by the tariffs filed by IP in this proceeding.

WHEREFORE, Petitioners pray they be granted leave to intervene, and become parties to the above styled proceeding for the purpose of submitting evidence and cross-examining witnesses and with the right to file appropriate briefs and pleadings and participate in oral argument before this Commission, should oral argument be granted.

Dated this \_\_\_\_\_ day of June, 2000.

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Eric Robertson  
Randall Robertson  
Edward C. Fitzhenry  
Lueders, Robertson & Konzen  
1939 Delmar Avenue  
P. O. Box 735  
Granite City, IL 62040  
(618) 876-8500

26873.1

PROOF OF SERVICE

STATE OF ILLINOIS       :  
                                  :  
COUNTY OF MADISON    :

SS

I, Eric Robertson., being an attorney admitted to practice in the State of Illinois and one of the attorneys for Illinois Industrial Energy Consumers herewith certify that I did on the \_\_\_\_ day of June, 2000, electronically file with the Illinois Commerce Commission a Petition for Leave to Intervene on behalf of the Illinois Industrial Energy Consumers, and have served same upon the persons identified on the attached service list, by depositing same in the United States Mail, in Granite City, Illinois with postage fully prepaid thereon.

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Eric Robertson  
Lueders, Robertson & Konzen  
1939 Delmar Avenue  
P. O. Box 735  
Granite City, IL 62040  
(618) 876-8500

SUBSCRIBED AND SWORN to me, a Notary Public, on this \_\_\_\_\_ day of \_\_\_\_\_, 2000.

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Notary Public

STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

ILLINOIS POWER COMPANY	:	
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Petition for Alternative Approval of Implementation	:	No. 00-0461
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NOTICE OF FILING

TO: See Attached Service List

PLEASE TAKE NOTICE that on this \_\_\_\_\_ day of June, 2000, we have electronically filed with the Illinois Commerce Commission, 527 East Capitol Ave., Springfield, Illinois, 62794, the Petition for Leave to Intervene of the Illinois Industrial Energy Consumer, along with Proof of Service thereon attached.

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Eric Robertson  
Lueders, Robertson & Konzen  
1939 Delmar Avenue  
P. O. Box 735  
Granite City, IL 62040  
(618) 876-8500

STATE OF ILLINOIS,                   :  
   :  
COUNTY OF MADISON,               :  
   :  
   :

SS

VERIFICATION

I, Eric Robertson, being duly sworn, depose and state that I have read the foregoing Petition for Leave to Intervene on behalf of the Illinois Industrial Energy Consumers, and state the contents therein are true and accurate to the best of my belief and knowledge.

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Eric Robertson  
Lueders, Robertson & Konzen  
1939 Delmar Avenue  
P. O. Box 735  
Granite City, IL 62040  
618-876-8500

SUBSCRIBED AND SWORN to before me, a Notary Public on this \_\_\_\_\_ day of  
June, 2000.

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Notary Public

ILLINOIS POWER COMPANY  
ALTERNATIVE TO THE NFF  
ICC DOCKET NO. 00-0461

SERVICE LIST

Mr. Larry Jones  
Hearing Examiner  
Illinois Commerce Commission  
527 E. Capitol Avenue  
Springfield, IL 62701

Mr. Sherman Elliott  
Illinois Commerce Commission  
527 E. Capitol Avenue  
Springfield, IL 62701

Mr. Robert Garcia  
Illinois Commerce Commission  
160 N. LaSalle - Ste. C-800  
Chicago, IL 60601-3104

Mr. Joe Lakshmanan  
Illinois Power Company  
500 South 27<sup>th</sup> Street  
Decatur, IL 62525